

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kimberly A. Cline	Debtor(s)	BK. NO. 20-20646 GLT
Kimberly A. Cline		
	Movant	CHAPTER 13
v. MTGLQ Investors, L.P.		
	Respondent	Document No. ____ Related to Document No. 44

**MEDIATOR’S STATEMENT PURSUANT TO
LOCAL BANKRUPTCY RULE 9019-3(k)**

AND NOW, comes Norman E. Gilkey, Esquire, the Mediator appointed by this Honorable Court on July 16, 2021 at Document No. 44 (the “Consent Order”), and files the within Statement.

1. The Mediator has made the requisite inquiry pursuant to *W.P.A.LBR 9019-3(j)* and has determined that in 2012 he represented a client adverse to the Respondent. The matter was concluded years ago. This prior representation was disclosed via a prior Consent Order of Court to the Court and to the parties, none of which had any objection. The Mediator accepts the appointment.

2. Pursuant to the Consent Order, the parties and the Mediator have agreed that the Mediator shall charge \$350.00 per hour for his services, which shall be paid one-half each by the two parties, unless otherwise agreed as part of a settlement. Further, the Mediator has agreed that his fees will not exceed \$3,500.00 absent prior approval from the parties. It is more likely that, in such event, the Mediator would not charge fees in excess of \$3,500.00 and would, instead, serve the balance of time on a pro bono basis. The Mediator is not requesting any retainers. The parties

and the Mediator have selected September 13, 2021 for the Mediation Session, which will take place in the Mediator's offices.

Dated: August 19, 2021

/s/ Norman E. Gilkey
Norman E. Gilkey, Esquire
PA I.D. No. 34310
Babst, Calland, Clements & Zomnir, P.C.
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Mediator

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Mediator's Statement Pursuant to Local Bankruptcy Rule 9019-3(k) was electronically filed and served electronically upon all registered counsel of record in the captioned Adversary Proceeding the 19th day of August, 2021, being in particular Francis Corbett at fcorbett@fcorbettlaw.com, and Maria Miksich at MMiksich@kmlawgroup.com.

Dated: August 19, 2021

/s/ Norman E. Gilkey
Norman E. Gilkey, Esquire
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